# SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name of industry: Pacific Choice Seafood Company

Address of industry: 1 Commercial Street, Eureka, CA 95501

Date of visit: 1/30/2018 | Time of visit: 3:05 p.m.–4:05 p.m.

Name of inspector(s):
David Adams, City of Eureka
Danny O'Connell, PG Environmental
Stephen Clark, PG Environmental

Provide the name(s) and title(s) of industry representative(s)

| Name | Title | Phone/Email |
|---|---|---|
| John King | General Manager | 707-442-2981 |
| Michael Macias | Maintenance Technician | 707-442-2981 |

IU Permit Number: 37 | Exp. Date: 9/30/2019 | IU Classification: non-categorical SIU

Please provide the following documentation:

1. Nature of operation: The facility is a seafood processor that fillets ground fish, cooks Dungeness crabs, and cooks and peels shrimp for fresh and frozen markets. The facility is classified under SIC Code 2092 (Prepared Fresh or Frozen Fish and Seafoods). The City has permitted the facility as a non-categorical SIU based on the volume of wastewater discharged to the POTW. This inspection focused on the pretreatment system. The fish processing area was not inspected as a component of this inspection.

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| 2. Number of employees | At most, 160. | Number of shifts: | 2 | Hours of operation: | 5 to 7 days per week; 7:00 a.m. – 2:00 a.m. |

3. Wastestream flow(s) discharged to the POTW: The facility generates wastewater from the shrimp cooking process, which is pretreated prior to being discharged to the POTW. Rinse and wash water from fish fillet processing is collected in floor drains equipped with screens that discharge to the POTW.

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| Sanitary: | 1,000 (gpd) | Process: | 50,000 – 150,000 (gpd) | Combined: | 51,000 – 150,000 (gpd) |

4. Describe any current or planned significant changes in process or flow: The facility representatives stated the facility is evaluating the feasibility of routing all process wastewater to the facility's pretreatment system. The inspection process identified numerous plumbing failures under the seafood processing area leaking wastewaters into the Eureka Slough. The facility contacts stated that they would get plumbers immediately to evaluate and fix plumbing failures. Refer to note 4 in the Notes section for additional information.

Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): The pretreatment system was not in operation at the time of the inspection since it was not shrimp processing season. When operating, the shrimp processing wastewater is sent to a hydro screen to separate the shells and other solids from the wastestream. Afterwards, hydro screen effluent flows by gravity to the pretreatment building. The influent to the pretreatment building is collected in an initial holding tank before being pumped to one of two equalization tanks. The wastewater from the equalization tanks is sent to a mixing tank where coagulant is added. A flocculant is added to the wastestream as it is pumped to the DAF unit. Solids removed from the DAF unit are pumped to a filter press; the filtrate is returned to the initial tank for treatment. Effluent from the DAF is discharged to the POTW. The Audit Team identified potential bypass lines at the pretreatment system, refer to note 2 in the Notes section for additional information.

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| X | Continuous flow | | Batch | | Combined |

Process area description (identify raw materials and processes used): The facility receives fish and seafood from boat and truck. Fish are filleted and packaged for shipment. Crabs and shrimp are cooked and packaged for shipment.

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| 7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Coagulant and flocculant were stored in the pretreatment building. | | | |
| Any floor drains? | No floor drains were observed in the pretreatment building. | Any spill control measures? | Not Reviewed (N/R). |
| 8. Are hazardous wastes drummed and labeled? N/R. | | | |
| 9. Does the IU have hazardous waste manifests? N/R. | | | |
| 10. Solid waste production and disposal: Solids are produced from the hydro screen and filter press and are hauled off-site for disposal as fertilizer. The solids produced from the fish processing was not reviewed during this inspection. | | | |
| 11. Description of sample location and methods: The City performs monitoring on behalf of the facility. The City collects grab samples from a manhole at the southeast corner of the facility, near Commercial Street. | | | |
| Notes: | | | |

1. **Finding – The Audit Team identified two locations that had wastewater line valves that could be used to bypass the pretreatment building.**

   The influent line to the initial holding tank (from the hydro screen) had a valve immediately prior to the pretreatment building (refer to Photograph 1). The valve appeared to be closed at the time of the inspection. However, if it were open, flows form the hydro screen would bypass the pretreatment system building (i.e. initial holding tank, equalization tanks, etc.). The bypass line (bypass 1) goes below ground, adjacent to a storm drain (refer to Photograph 2). The second bypass valve is located at the hydro screen on the line flowing towards the pretreatment building (refer to Photograph 1). If closed, this valve would direct flow back towards the process building and then to the POTW (refer to Photograph 2). The facility representative stated that when the hydro screen is cleaned (after shrimp processing), wash waters are not sent to the pretreatment system, but bypass the pretreatment system and discharge directly to the POTW, through this route. It's unclear why there were two separate bypass routes.

   The Audit Team also identified another potential bypass location within the pretreatment building. The initial holding tank that collects pretreatment system influent had an overflow pipe which was routed to the exterior of the pretreatment building through the wall adjacent to the tank. The pipe was positioned above what appeared to be a storm drain inlet, refer to finding 2, below, for additional information (refer to Photographs 3 and 4).

   The facility had not previously notified the City of the need to bypass or of bypass events that occurred at the facility.

   **Regulatory Requirement**

   Part 4.D.1 of the permit states that bypass is prohibited, and the City may take enforcement action against the permittee for a bypass, unless: (a) the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; (b) there were no feasible alternatives to the bypass; and (c) a bypass which does not cause pretreatment standards or requirements to be violated, but only if it also is essential maintenance to assure efficient operation, and the permittee submitted notice as required under this section.

   **Requirement**

   The City is required to enforce Part 4.D.1 of the permit and ensure that facility follows the correct bypass procedures. The City shall conduct a follow up inspection at the facility to identify the ultimate destination of the bypass line. In the event that the bypass line discharges to the storm drain, the appropriate representatives shall be notified. The City shall also evaluate the operating procedures for the

bypass valve being positioned in the "open" operating mode.

**Recommendation**

It is recommended that all process and wash wastewaters be sent to the pretreatment system for treatment prior to discharge in an effort to eliminate the need for the facility to bypass the pretreatment system.

2. **Finding – The Audit Team identified an undocumented potential discharge location from the initial holding tank to an unknown destination.**

During the inspection of the pretreatment system in the pretreatment building, the Audit Team observed a flexible hose leading from the overflow pipe in the initial holding tank, through the building wall, to an outside drain (refer to Photographs 3 and 4). The facility and City representatives were unsure of the drain's final destination. Additionally, staining, resembling a grate cover, was observed near the drain, indicating that the grate cover may be periodically removed for periods of time (refer to Photograph 4).

**Regulatory Requirement**

40 CFR 403.8(f)(2)(ii) requires the POTW to identify the character and volume of pollutants contributed to the POTW by the industrial users.

Part 1.K of the permit states that operational controls, such as floor drain grates and P-tarp covers, shall be used to prevent carcasses, fish skins, and any other solid debris greater than one inch in any dimension from entering the sanitary sewer.

**Requirement**

The City is required to identify the destination of the outdoor drain and evaluate the facility's discharge practices to said drain. Specifically, the City shall identify what is discharged to the drain, during what circumstances these discharges occur, if they are bypassing the pretreatment system and sampling location, and if they are necessary. In the event that the drain leads to the storm drain system, the appropriate representatives should be notified.

Additionally, the City shall also evaluate the staining on the impervious surface resembling the grate cover and identify the reason for the removal of the grate cover. The City shall ensure that the cover had not been removed to allow solids to discharge to the POTW per Part 1.K of the permit.

3. **Finding –The Audit Team observed wastewater treatment chemicals close to its expiration date.**

The Audit Team observed that the expiration date on the container of the flocculant stored in the pretreatment building was January 25, 2018 (refer to Photograph 5).

**Recommendation**

The Audit Team recommends that the City follow-up with the facility to ensure that it is using chemicals that will meet the performance needs of the pretreatment system.

4. **Finding – Some of the facility's sewer connections were deteriorating and were contributing to unpermitted discharges to the Eureka Slough.**

The Audit Team observed multiple broken, leaking, and deteriorated pipes underneath the facility where the building meets the shoreline of the Eureka Slough. This area of the facility is raised above the shoreline since it is a tidally influenced area. During the inspection, the tide was at a low point, thereby allowing the Audit Team to walk underneath the facility. Based on high water marks observed on the support pillars, access to this area via foot is difficult during high tide. Multiple pipes were leaking water from an unidentified source to the shore, which then flowed to the Eureka Slough (refer

to Photographs 6 through 14). While many of the pipes appeared to be associated with the process wastewater/sanitary sewer system, the water did not appear to be from a domestic source based on its visual appearance (i.e., no domestic solids) and lack of odor. The facility's Maintenance Technician stated that in the past, the facility had hired a plumber to evaluate the piping in this area for repair; however, the plumber left without providing a summary of the assessment to the facility. It was unclear when this evaluation was conducted and when the leaking pipes had failed in relation to the plumber's evaluation of the infrastructure. The Inspection Team observed the following in regard to the plumbing under the facility:

- The rusted pipe conveying the most significant flow discharging to the Eureka Slough did not appear to have any sewer infrastructure downstream of the discharge point. It was unclear to the Audit Team how this line connected to the sanitary sewer (refer to Photographs 8 and 9).
- The Audit Team observed heavy grade black tape on a P trap that was leaking and plastic sheeting was observed in one area (refer to Photographs 12 through 14). It was unclear if the tape or plastic sheeting was related to any previous pipe repair work.
- A rock under one of the P traps was moist from leaking wastewater and appeared to have bio-growth in these areas. This bio-growth appeared to by a result of the wastewater leaking from the pipe (refer to Photograph 14).
- During the exit interview the facility representative was informed the leaks of wastewaters from facility's plumbing needed to be corrected immediately. The representative stated that he would call a plumber immediately.

**Regulatory Requirement**

40 CFR 122 requires that direct discharge of wastewater to waters of the United States must be permitted under the NPDES Program.

50.092, Maintenance of Building Sewers, of the SUO states:

"All users shall keep, operate, and maintain their building sewer connections, including that portion thereof within a public right-of-way, in good order and condition and free of roots, grease, sand, and other nonstructural related obstructions and shall be liable for damages which may result from their failure to do so."

**Requirement**

The facility is required to cease the direct discharge of wastewater to the Eureka Slough immediately.

The City is required to enforce Section 50.092 of the SUO and ensure that the facility is properly operating and maintaining the building sewer connections.

**Recommendation**

The Audit Team strongly recommends that the City have a formal meeting with company representatives concerning the plumbing infrastructure, unpermitted discharges, and overall permit compliance. The company representatives should have past and future building plans and plumbing diagrams so that all sewer and storm system sewer lines are clearly identified.

The City should refer this issue to the proper storm water authorities, who should ultimately identify if this is an unpermitted discharge, and take action as necessary.

The Audit Team also recommends that all buildings and piers with water and wastewater utilities located over water or on the shore line be inspected for similar issues with infrastructure assets exposed to tidal impacts or hidden from regular maintenance inspections.